

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

Civil Action No. 1:04-CV-11923 (DPW)

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and THEFACEBOOK,
INC.,

Defendants.

MARK ZUCKERBERG, and THEFACEBOOK,
INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**ASSENTED-TO MOTION TO FILE UNDER SEAL
FACEBOOK DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION
TO COMPEL ANSWERS TO INTERROGATORY NOS. 6, 9-14, 16, AND 18**

Defendants Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, Christopher Hughes, and TheFacebook, Inc.¹ ("the Facebook Defendants") hereby move to file under seal, pursuant to the Stipulated Protective Order entered by the Court in this case, the following pleading:

¹ Defendant Eduardo Saverin is represented by separate counsel in this matter.

- **FACEBOOK DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL ANSWERS TO INTERROGATORY NOS. 6, 9-14, 16, AND 18.**

The Facebook Defendants respectfully request permission to file this pleading under seal because it contains information that has been designated by the Plaintiff as confidential under the Stipulated Protective Order entered in this case. In accordance with the Local Rules, the Facebook Defendants respectfully request that this pleading be impounded until the final resolution of this litigation between the parties, at which time it will be retrieved by counsel for the Facebook Defendants.

WHEREFORE, it is respectfully requested that the Court grant this assented-to motion to file the above-described document under seal.

Certification Pursuant to Local Rule 7.1

The Facebook Defendants' counsel certifies that pursuant to Local Rule 7.1, the parties' counsel have conferred regarding the issues presented by this motion, and Plaintiff's counsel assented to this motion.

Dated: September 13, 2005.

Respectfully submitted,

/s/ Jeremy P. Occek

Steven M. Bauer
Jeremy P. Occek
PROSKAUER ROSE LLP
One International Place, 22nd Floor
Boston, MA 02110-2600
Telephone: (617) 526-9600
Facsimile: (617) 526-9899
sbauer@proskauer.com
joccek@proskauer.com

G. Hopkins Guy, III*
I. Neel Chatterjee*
Monte M.F. Cooper*
Joshua H. Walker*
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 614-7400
Facsimile: (650) 614-7401
hopguy@orrick.com
nchatterjee@orrick.com
mcooper@orrick.com
jwalker@orrick.com

ATTORNEYS FOR MARK ZUCKERBERG,
DUSTIN MOSKOVITZ, ANDREW
MCCOLLUM, CHRISTOPHER HUGHES, and
THEFACEBOOK, INC.

* Admitted Pro Hac Vice